



# California Regional Water Quality Control Board

## Santa Ana Region



Alan C. Lloyd Ph.D.  
Agency Secretary

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Arnold Schwarzenegger  
Governor

September 14, 2005

Mr. Darren Newton  
Marine Corps Air Station El Toro  
Base Realignment and Closure  
7040 Trabuco Road  
Irvine, CA 92618

### **COMMENTS ON DRAFT ADDENDUM TO THE FINAL INTERIM PETROLEUM CORRECTIVE ACTION PLAN, MTBE GROUNDWATER EXTRACTION AND TREATMENT SYSTEM, PHASE 1 AND PHASE 2 AT UST SITE 222, FORMER MARINE CORPS AIR STATION, TUSTIN**

Dear Mr. Newton:

We have completed our review of the above-referenced document, dated July 2005, which we received on July 11, 2005. The document discusses activities that will address residual gasoline in the soil and the use of infiltration to dispose of a portion of the treated groundwater. The installation of additional groundwater monitoring wells is also proposed. We have the following comments:

- Discharge to Land for Infiltration

We concur with the proposed work plan, provided that the treated water used for irrigation is not allowed to pond on the ground surface for an extended period of time. Pondered water could attract wildlife, or overflow as runoff into storm drains which connect to a surface water. The high concentration of selenium in the water could adversely affect wildlife.

- Site Maintenance

We suggest the development of an operation and maintenance plan to prevent the excess growth of plants.

- MTBE Remediation Goal

Based on the modeling results that you presented in the report, we accept your proposed remediation goal of 300 micrograms per liter (µg/l) for the 1<sup>st</sup> water bearing zone and 44 µg/l for the second water-bearing zone. After shut-down of the treatment system, we will require, at a minimum, one year of groundwater monitoring to verify that the residual plume is stable and/or shrinking.

If you should have any questions, please call me at (951) 782-4498 or send e-mail to [phannon@waterboards.ca.gov](mailto:phannon@waterboards.ca.gov).

Sincerely,

*Original signed by*

Patricia A. Hannon  
SLIC/DoD Section

cc: Mr. (Ram) Anantaraman Peddada, Dept. of Toxic Substances Control  
Mr. Marc P. Smits, Southwest Division, Naval Facilities Engineering Command  
Mr. James Ricks, U. S. EPA, Region IX